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13 Attorneys for Defendants Hyundai Motor America and Hyundai Motor Company

14

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

17 LAUREN L. LAVOIE, individually, LAUREN
 L. LAVOIE, as Guardian and Natural Parent of
 18 L.S., a Minor,

No.: 2:22-cv-00628-GMN-MDC

19 Plaintiff,

**STIPULATION AND ORDER TO DISMISS
WITH PREJUDICE**

20 vs.

21 HYUNDAI MOTOR AMERICA, a Foreign
 Corporation; HYUNDAI MOTOR COMPANY,
 22 a Foreign Corporation; DOES I-X; ROES
 CORPORATIONS I-X; inclusive,

23 Defendants.

25 IT IS HEREBY STIPULATED by and between plaintiffs Lauren L. Lavoie and L.S. a minor,
 26 by and through their counsel of record, Christiansen Trial Lawyers, and defendants Hyundai Motor
 27 America and Hyundai Motor Company, by and through their counsel of record, Bowman and Brooke
 28 LLP and Mario D. Valencia, Attorney at Law, LLC, that the above-captioned action shall be

1 dismissed with prejudice pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure.
2 Each party shall bear their own attorneys' fees and costs. The parties have resolved this matter in its
3 entirety and request the Court to close the case with prejudice.

4

5 DATED this 31st day of March, 2025.

6 **CHRISTIANSEN TRIAL LAWYERS**

7 By: /s/Whitney J. Barrett, Esq.

8 Peter S. Christiansen, Esq. (Bar No. 5254)
9 R. Todd Terry, Esq. (Bar No. 6519)
10 Whitney J. Barrett, Esq. (Bar No. 13662)
11 710 South 7th Street, Suite B
Las Vegas, Nevada 89101

12 *Attorneys for Plaintiffs*

13 DATED this 31st day of March, 2025.

14 **BOWMAN AND BROOKE LLP**

15 By: /s/Jessica E. Brown, Esq.

16 Paul G. Cereghini (Bar No. 10000)
Jeffrey C. Warren (*Pro Hac Vice*)
Jessica E. Brown (Bar No. 14487)
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2929 North Central Avenue
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17 Mario D. Valencia (Bar No. 6154)

18 **MARIO D. VALENCIA**

19 **ATTORNEY AT LAW, LLC**
40 S. Stephanie St., Ste. 201
Henderson, Nevada 89012

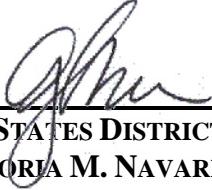
20 *Attorneys for Defendants Hyundai Motor
America and Hyundai Motor Company*

21 **ORDER**

22 This matter is DISMISSED WITH PREJUDICE and the Clerk is directed to close the case.

23 IT IS SO ORDERED.

24 DATED: March 31, 2025

25 
UNITED STATES DISTRICT JUDGE
GLORIA M. NAVARRO

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on the 31st day of March, 2025, I electronically transmitted the foregoing
3 **STIPULATION AND ORDER TO DISMISS WITH PREJUDICE** to the Clerk's Office using the
4 CM/ECF System for filing thereby transmitting a Notice of Electronic Filing to all CM/ECF registrants:

5 Peter S. Christiansen, Esq.

6 R. Todd Terry, Esq.

7 Whitney J. Barrett, Esq.

8 Keely A. Chippoletti, Esq.

9 **CHRISTIANSEN TRIAL LAWYERS**

10 710 S. 7th St., Ste. B

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12 pete@christiansenlaw.com

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15 keely@christiansenlaw.com

16 *Attorneys for Plaintiff*

17 _____
18 /s/*Jeannette Felix*

19 An employee of Bowman and Brooke LLP

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21
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25
26
27
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Jeannette Felix

From: Whitney J. Barrett <wbarrett@christiansenlaw.com>
Sent: Friday, March 28, 2025 4:51 PM
To: Jess Brown <Jessica.Brown@bowmanandbrooke.com>
Cc: Jeannette Felix <Jeannette.Felix@bowmanandbrooke.com>
Subject: Re: 2025-03-27 Stipulation and Order to Dismiss (31579733.1).docx

Hi Jess,

You have my approval to submit this stipulation and order.

Thanks,

Whitney

Whitney J. Barrett
Attorney
Christiansen Trial Lawyers
710 South 7th Street
Las Vegas, NV 89101
Phone (702) 240-7979
Fax (866) 412-6992

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On Fri, Mar 28, 2025 at 2:36 PM, Jess Brown <Jessica.Brown@bowmanandbrooke.com> wrote:

Whitney,

Please see attached the Stipulation and Order to Dismiss as discussed. Please let me know if we have your permission to add your signature and file this with the Court.

Kind regards,

Jess

Jessica E. Brown
Associate
+1 602-643-2411 | Jessica.Brown@bowmanandbrooke.com



Note: This electronic mail is intended to be received and read only by certain individuals. It may contain information that is attorney-client privileged or protected from disclosure by law. If it has been misdirected, or if you suspect you have received this in error, please notify me by replying and then delete both the message and reply. Thank you.